

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CINCINNATI DIVISION**

VICTORIA LOVETT, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CONTINUED.COM, LLC,

Defendant.

Case No. 1:24-cv-00590

District Judge: Hon. Douglas R. Cole

Magistrate Judge Stephanie K. Bowman

PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Victoria Lovett respectfully submits *Guereca v. Motorsport.tv Digital, LLC*, No. 1:24-CV-24066, ECF No. 30 (S.D. Fla. Feb. 19, 2025), as supplemental authority in further support of her Opposition to Defendant’s Motion to Dismiss.

In *Guereca*, the plaintiff alleged that the defendant disclosed his “subscription and Private Viewing Information—including his FID, his purchase videos, the title of the prerecorded video materials he accessed and obtained from [d]efendant’s website, and the URL where such video is available—to Meta during the applicable statutory period. . . .” (*Guereca*, ECF No. 1, Page 4.) The district court cited this exact allegation and others to conclude that the plaintiff satisfied each element of his VPPA claim “by alleging that [d]efendant knowingly disclosed its consumers’ personally identifiable information (PII) — including his own — to Meta via the Meta Pixel, and, further, that the disclosure was not authorized by section 2710(b)(2).”

The *Guereca* decision is relevant to (i) Plaintiff’s argument that she adequately alleged “Defendant’s disclosure of Plaintiff’s “personally identifiable information” to Meta.” (*see* Doc. 9 at PageIDs 65-68); and (ii) the persuasiveness of Plaintiff’s contention that the “overwhelming majority of district courts” find similar allegations are sufficient (*see* Doc. 9 at PageID 68).

Respectfully submitted,

HEDIN LLP

Dated: February 27, 2025

/s/ Elliot O. Jackson

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Counsel for Plaintiff and Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notification of such filing to all parties of record.

/s/ Elliot O. Jackson